

**JEFFREY P. MANS, ESQ.**  
LAW OFFICE OF JEFFREY P. MANS  
P.O. Box 11-282  
Albany, New York 12211  
(518) 265-4135  
ADKHIGHLANDER@GMAIL.COM

October 28, 2019

Hon. Peggy Kuo  
United States District Court Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Nicomedez v. City of New York, et al.  
19-CV-4470 (RRM) (PK)  
(USDC)(EDNY)

Dear Judge Kuo:

I represent defendant Thaddeus Wroblewski in the above-referenced action. Pursuant to your Honor's Individual Rules regarding adjournments, I am writing to request an adjournment of the Initial Conference scheduled for November 5, 2019 (Dkt. 21), based upon defendant Wroblewski's request for a pre-motion conference to file a FRCP Rule 12(b)(6) motion to dismiss the complaint against him for failure to state a claim, and for an extension of the time to answer the complaint (Dkt. 26), which was granted by the Court. Additionally, if my request herein is not granted by the Court, I respectfully request permission to participate in the initial conference by telephone since I have a broken ankle, cast and crutches, making it difficult to travel and get to the Court at the present time.

No prior requests have been made for such adjournment, and it would not affect any other scheduled dates or deadlines. Counsel for all parties have consented to this request, and counsel for the City of New York/NYPD defendants also joins this request for an adjournment based upon the fact that his office is closed on November 5<sup>th</sup> (Election Day).

Thank you for your consideration.

Respectfully yours,

*Jeffrey P. Mans*  
Jeffrey P. Mans

cc: All Counsel of Record (via ECF)